



U.S. Department of Justice

United States Attorney  
Southern District of New York

Jacob K. Javits Federal Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

March 14, 2025

**BY ECF**

The Honorable Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States of America v. M/Y Amadea, et al.*  
23 Civ. 9304 (DEH)

Dear Judge Ho:

The Government respectfully requests that the Court enter the attached proposed Judgment of Forfeiture. As set forth in the Court's Memorandum and Order (D.E. 466), the Government's motions to strike the claim of Eduard Khudainatov and Millemarin Investments Ltd. and for case-dispositive sanctions were granted, and the Clerk has entered a Default Judgment (D.E. 469). As set forth in the attached Declaration, no other claims have been filed or made in this action and no other parties have appeared to contest the action, and the requisite time periods in which to do so, as set forth in Title 18, United States Code, Section 983(a)(4)(A) and Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Claims, have expired.

Accordingly, the attached proposed Judgment of Forfeiture should be entered so that the United States Marshals Service can dispose of the Defendant-*in-rem* according to law.

Respectfully submitted,

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